

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION)	MDL 2804
OPIATE LITIGATION)	
)	Case No. 1:17-md-2804
THIS DOCUMENT RELATES TO:)	
)	Judge Dan Aaron Polster
<i>1:19-OP-45993-DAP</i>)	
)	SHORT FORM FOR
<i>WESTMORELAND COUNTY,</i>)	SUPPLEMENTING COMPLAINT AND
<i>VIRGINIA; RICHMOND COUNTY,</i>)	AMENDING DEFENDANTS AND
<i>VIRGINIA; WARREN COUNTY,</i>)	JURY DEMAND
<i>VIRGINIA, and all other similarly</i>)	
<i>situated, v. PURDUE PHARMAL.P., et</i>)	
<i>al.</i>)	

Plaintiff submits this supplemental pleading and Amended Complaint incorporating as if fully set forth herein its own prior pleadings and, if indicated below, the common factual allegations identified and the RICO causes of action included in the Corrected Second Amended Complaint and Jury Demand in the case of *The County of Summit, Ohio, et al., v. Purdue Pharma L.P., et al.*, Case No. 1:18-op-45090 (“*Summit County Pleadings*”), *In Re National Prescription Opiate Litigation*, in the United States District Court for the Northern District of Ohio, Doc. ##: 513, 514,¹ and as may be amended in the future, and any additional claims asserted herein. Plaintiff also hereby amends its complaint to alter the defendants against which claims are asserted as identified below. To the extent defendants were previously sued in plaintiff(s)’ existing complaint and they are no longer identified as defendants herein, they have been dismissed without prejudice except as limited by CMO-1, Section 6(e). Doc. #: 232.

¹ Docket #: 513 is the redacted Summit Second Amended Complaint and Docket #: 514 is the unredacted Summit Corrected Second Amended Complaint filed under seal in Case No. 1:17-md-02804-DAP. The redacted Summit Corrected Second Amended Complaint is also filed in its individual docket, Case No. 1:18-op-45090-DAP, Docket #: 24.

INCORPORATION BY REFERENCE OF EXISTING COMPLAINT

1. Plaintiff(s)' Existing Complaint *Westmoreland County, Virginia, et al. v. Purdue Pharma, L.P., et al.* (1:19-op-45993-DAP), as well as the *Summit County* Pleadings are expressly incorporated by reference to this Short Form as if fully set forth herein except to the extent that allegations regarding certain defendants that are not listed in section 2 below are dismissed without prejudice.

PARTIES – DEFENDANTS

2. Having reviewed the relevant ARCOS data, Plaintiff asserts claims against the following Defendants:

Actavis Pharma, Inc. f/k/a Watson Pharma, Inc.; Alpharma Pharmaceuticals LLC; Amerisource Bergen Drug Corporation; Amneal Pharmaceuticals LLC; Anda, Inc.; Auburn Pharmaceutical; Cardinal Health, Inc.; Cephalon, Inc.; CVS Health Corporation; Eckerd Corporation; Endo Pharmaceuticals, Inc.; Henry Schein Inc.; Impax Laboratories, Inc. n/k/a Amneal Pharmaceuticals, Inc.; Janssen Pharmaceuticals, Inc.; Kerr Drug, Inc.; KeySource Medical, Inc.; KVK-Tech, Inc.; McKesson Corporation; Mylan Pharmaceuticals, Inc.; N CMutual Wholesale Drug Co.; Par Pharmaceutical, Inc.; Pfizer Laboratories Div Pfizer Inc.; PharMEDium Services, LLC; Purdue Pharma L.P.; Qualitest Pharmaceuticals; Rhodes Pharmaceuticals; Richie Pharmacal; RiteAid Corporation; River City Pharma; Sandoz, Inc.; Smith Drug Company a/k/a J M Smith Corporation; SpecGx LLC; Sun Pharmaceutical Industries, Inc.; TEVA Pharmaceuticals USA, Inc.; TopRx, LLC; The Harvard Drug Group; Walgreens Boots Alliance, Inc.; Wal-Mart, Inc.; West-Ward Pharmaceuticals Corp. k/n/a Hikma Pharmaceuticals, PLC; Zydus Pharmaceuticals (USA), Inc.

I, Robert K. Finnell, Counsel for Plaintiff(s), certify that in identifying all Defendants, I have followed the procedure approved by the Court and reviewed the ARCOS data that I understand to be relevant to Plaintiff(s).

I further certify that, except as set forth below, each of the Defendant(s) newly added herein appears in the ARCOS data I reviewed.

I understand that for each newly added Defendant not appearing in the ARCOS data I must set forth below factual allegations sufficient to state a claim against any such newly named Defendant that does not appear in the ARCOS data.

The following newly added Defendant(s) *do not appear* in the ARCOS data I reviewed:

Dated: March 16, 2021

Signed: /s/ Robert K. Finnell

Factual Allegations Regarding Individual Defendants

Alpharma Pharmaceuticals, LLC; Amneal Pharmaceuticals LLC; Anda, Inc.; Auburn Pharmaceutical; CVS Health Corporation; Eckerd Corporation; Henry Schein Inc.; Impax Laboratories, Inc. n/k/a Amneal Pharmaceuticals, Inc.; Kerr Drug, Inc.; KeySource Medical, Inc.; KVK-Tech, Inc.; Mylan Pharmaceuticals, Inc.; N C Mutual Wholesale Drug Co.; Par Pharmaceutical, Inc.; Pfizer Laboratories Div Pfizer, Inc.; PharMEDium Services, LLC; Qualitest Pharmaceuticals; Rhodes Pharmaceuticals; Richie Pharmacal; Rite Aid Corporation; River City Pharma; Sandoz, Inc.; Smith Drug Company a/k/a J M Smith Corporation; SpecGx LLC; Sun Pharmaceutical Industries, Inc.; The Harvard Drug Group; TopRx, LLC; Walgreens Boots Alliance, Inc.; Wal-Mart, Inc.; West-Ward Pharmaceuticals Corp. k/n/a Hikma Pharmaceuticals, PLC; Zydus Pharmaceuticals (USA), Inc.

2.1 Defendant **Alpharma Pharmaceuticals, LLC (“Alpharma”)** is headquartered in Piscataway, New Jersey and operates as a subsidiary of King Pharmaceuticals, Inc. Alpharma Pharmaceuticals, LLC manufactures, promotes, distributes, and/or sells opioids throughout Plaintiffs’ Communities and/or the rest of the nation in violation of the duties owed to Plaintiff, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Alpharma Pharmaceuticals, LLC is being sued as a Marketing Defendant.

2.2 Defendant **Amneal Pharmaceuticals LLC (“Amneal”)** is a Delaware corporation with its principal place of business in Bridgewater Township, New Jersey. Amneal was created when Amneal Pharmaceuticals, LLC merged with Impax in 2018. Amneal manufactures, promotes, distributes, and/or sells opioids throughout Plaintiffs’ Communities and/or the rest of the nation in violation of the duties owed to Plaintiffs, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Amneal is being sued as a Marketing Defendant.²

² “Marketing Defendant” is the term used in the *The County of Summit, Ohio, et al., v. Purdue Pharma L.P., et al.*, Case No. 1:18-op-45090 pleadings. In Plaintiffs’ original complaint, incorporated herein, the term “Manufacturer Defendants” was used to refer to the same entities. For the purposes of this Short Form Complaint, Plaintiffs use the term “Marketing Defendant” but expressly incorporates each and every jurisdictional and factual allegation previously asserted in Plaintiffs’ original complaint against the “Manufacturing Defendants.”

2.3 Defendant **Anda, Inc. (“Anda”)**, through its various DEA registrant subsidiaries and affiliated entities, including but not limited to Anda Pharmaceuticals, Inc., is the fourth largest distributor of generic pharmaceuticals in the United States. Anda is a Florida corporation with its principal place of business in Weston, Florida. In October 2016, Defendant Teva acquired Anda from Allergan plc (*i.e.*, Defendant Actavis) for \$500 million. At all relevant times, Anda operated as a licensed pharmaceutical wholesaler in Plaintiffs’ communities. Anda distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs’ original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Anda is being sued as a Distributor Defendant.

2.4 Defendant **Auburn Pharmaceutical Company (“Auburn Pharmaceutical”)** is a Michigan Corporation with its principal place of business in Troy, Michigan. Auburn Pharmaceutical distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs’ original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Auburn Pharmaceutical is being sued as a Distributor Defendant.

2.5 Defendant **CVS Health Corporation (“CVS”)** is a Delaware corporation with its principal place of business in Rhode Island. CVS Health Corporation conducts business as a licensed wholesale distributor under the following named business entities: CVS Indiana, L.L.C.; CVS Orlando FL Distribution; CVS Pharmacy, Inc.; CVS RX Services, Inc, d/b/a CVS Pharmacy Distribution Center; CVS TN Distribution, LLC; and CVS VERO FL Distribution, L.L.C (collectively “CVS”). CVS is registered to conduct business and/or conducts business in Plaintiffs’ community as a licensed wholesale pharmaceutical Distributor. CVS distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs’ original complaint

and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs' injuries. CVS is being sued as a Distributor Defendant.

2.6 Defendant **Eckerd Corporation d/b/a Eckerd Pharmacy ("Eckerd")** is a Delaware corporation with its headquarters in Largo, Florida. Eckerd distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs' original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs' injuries. Eckerd is being sued as a Distributor Defendant.

2.7 Defendant **Henry Schein Inc. ("Henry Schein")** is a Delaware corporation with its principal place of business in Melville, New York. Henry Schein distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs' original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs' injuries. Henry Schein is being sued as a Distributor Defendant.

2.8 Defendant **Impax Generics n/k/a Amneal Pharmaceuticals, Inc. ("Amneal")** is a Delaware corporation with its principal place of business in Bridgewater Township, New Jersey. Amneal was created when Amneal Pharmaceuticals, LLC merged with Impax in 2018. Amneal manufactures, promotes, distributes, and/or sells opioids throughout Plaintiffs' Communities and/or the rest of the nation in violation of the duties owed to Plaintiffs, in sufficient quantities to be a proximate cause of Plaintiffs' injuries. Amneal is being sued as a Marketing Defendant.

2.9 Defendant **Kerr Drug, Inc. n/k/a Walgreens Boots Alliance, Inc. ("Walgreens")** Walgreens is a Delaware corporation with its principal place of business in Deerfield, Illinois. During all relevant times, Walgreens distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs' original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs' injuries. Walgreens is being sued as a Distributor Defendant.

- 2.10 Defendant **KeySource Medical, Inc. (“KeySource”)** is an Ohio corporation with its principal office located in Cincinnati, Ohio. KeySource distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs’ original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. KeySource is being sued as a Distributor Defendant.
- 2.11 Defendant **KVK-Tech, Inc. (“KVK”)** is a Pennsylvania corporation with its principal place of business in Newtown, Pennsylvania. KVK manufactures, promotes, distributes, and/or sells opioids throughout Plaintiffs’ Communities and/or the rest of the nation in violation of the duties owed to Plaintiff, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. KVK is being sued as a Marketing Defendant.
- 2.12 Defendant **Mylan Pharmaceuticals, Inc. (“Mylan”)** is a Pennsylvania corporation, with its principal place of business located in Canonsburg, Pennsylvania. Mylan is a wholly owned subsidiary of Mylan Laboratories, Ltd., which is a wholly owned subsidiary of Mylan, Inc. Mylan manufactures, promotes, distributes, and/or sells opioids throughout Plaintiffs’ Communities and/or the rest of the nation in violation of the duties owed to Plaintiffs in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Mylan is being sued as a Marketing Defendant.
- 2.13 Defendant **N.C. Mutual Wholesale Drug Co. a/k/a Mutual Drug (“N.C. Mutual”)** is a North Carolina company headquartered in Durham, North Carolina. N.C. Mutual distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs’ original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. N.C. Mutual is being sued as a Distributor Defendant.

2.14 Defendant **Par Pharmaceutical, Inc.** is a Delaware corporation with its principal place of business located in Chestnut Ridge, New York. Par Pharmaceutical, Inc. is a wholly- owned subsidiary of Par Pharmaceutical Companies, Inc. f/k/a Par Pharmaceutical Holdings, Inc. Defendant **Par Pharmaceutical Companies, Inc.** is a Delaware corporation with its principal place of business located in Chestnut Ridge, New York. Par Pharmaceutical, Inc., and Par Pharmaceutical Companies, Inc., (collectively “Par Pharmaceutical”) was acquired by Endo International plc in September 2015 and is an operating company of Endo International plc. Par Pharmaceutical is registered to conduct business and/or conducts business in Plaintiffs’ community as a licensed wholesale pharmaceutical distributor. Par Pharmaceutical manufactures, promotes, distributes, and/or sells opioids throughout Plaintiffs’ Communities and/or the rest of the nation in violation of the duties owed to Plaintiff, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Par Pharmaceutical is being sued as a Marketing Defendant.

2.15 Defendant **Pfizer Laboratories Div Pfizer Inc. (“Pfizer”)** is a Delaware corporation with its principal place of business in New York, New York. Pfizer manufactures, promotes, distributes, and/or sells opioids throughout Plaintiffs’ Communities and/or the rest of the nation in violation of the duties owed to Plaintiffs in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Pfizer is being sued as a Marketing Defendant.

2.16 Defendant **Qualitest Pharmaceuticals n/k/a Endo Pharmaceuticals, Inc. (“Endo”)** Endo Pharmaceuticals, Inc. is a wholly owned subsidiary of Endo Health Solutions Inc. and

is a Delaware corporation with its principal place of business at Malvern, Pennsylvania. Endo distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs' original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs' injuries. Endo is being sued as a Distributor Defendant.

2.17 Defendant **PharMEDium Services LLC ("PharMEDium")** is a Delaware limited liability company headquartered in Lake Forest, Illinois. PharMEDium Services LLC distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs' original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs' injuries. PharMEDium is being sued as a Distributor Defendant.

2.18 Defendant **Rhodes Pharmaceuticals ("Rhodes")** is a Delaware limited partnership formed in or around 2007 with headquarters located in Coventry, Rhode Island. Rhodes manufactures, promotes, distributes, and/or sells opioids throughout Plaintiffs' Communities and/or the rest of the nation in violation of the duties owed to Plaintiffs in sufficient quantities to be a proximate cause of Plaintiffs' injuries. Rhodes is being sued as a Marketing Defendant.

2.19 Defendant **Richie Pharmacal Co. ("Richie")** is incorporated in Kentucky with a principal place of business in Glasgow, Kentucky. Richie distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs' original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs' injuries. Richie is being sued as a Distributor Defendant.

2.20 Defendant **Rite Aid Corporation n/k/a Rite Aid Mid-Atlantic Customer Support**

Center (“Rite Aid”) is a Delaware corporation with its principal place of business in Camp Hill, Pennsylvania. During all relevant times, Rite Aid distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs’ original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Rite Aid is being sued as a Distributor Defendant.

2.21 Defendant **River City Pharma (“River City”)** is an Ohio limited liability company

headquartered in Mason, Ohio. River City distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs’ original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. River City is being sued as a Distributor Defendant.

2.22 Defendant **Sandoz, Inc. (“Sandoz”)** is a Colorado corporation with its principal place of

business in Princeton, New Jersey. Sandoz manufactures, promotes, distributes, and/or sells opioids throughout Plaintiffs’ Communities and/or the rest of the nation in violation of the duties owed to Plaintiffs in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Sandoz is being sued as a Marketing Defendant.

2.23 Defendant **Smith Drug Company a/k/a J M Smith Corporation (“Smith Drug**

Company”), is registered with the West Virginia Secretary of State as a South Carolina corporation with its principal office located in Spartanburg, South Carolina, doing business as Smith Drug Company. Smith Drug Company distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs’ original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Smith Drug Company is being sued as a Distributor Defendant.

2.24 Defendant **SpecGx LLC (“SpecGx”)** is a Delaware limited liability company with its headquarters in Clayton, Missouri, and is a wholly owned subsidiary of Mallinckrodt plc. Mallinckrodt plc, Mallinckrodt LLC, and SpecGx, and their DEA registrant subsidiaries and affiliates (together “Mallinckrodt”) manufacture, promote, distribute, and/or sell opioids throughout Plaintiffs’ Communities and/or the rest of the nation in violation of the duties owed to Plaintiffs in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. SpecGx is being sued as a Marketing Defendant.

2.25 Defendant **Sun Pharmaceutical Industries, Inc. (“Sun Pharmaceutical”)**, headquartered in Cranbury, New Jersey, is a wholly owned subsidiary of Sun Pharmaceutical Industries Ltd., an Indian multinational pharmaceutical company headquartered in Mumbai, India. Sun Pharmaceutical manufactures, promotes, distributes, and/or sells opioids throughout Plaintiffs’ Communities and/or the rest of the nation in violation of the duties owed to Plaintiff, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Sun Pharmaceutical is being sued as a Marketing Defendant.

2.26 Defendant **The Harvard Drug Group, L.L.C. (“Harvard Drug”)** is a Michigan limited liability company with its principal office located in Plymouth, Michigan. Harvard Drug distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs’ original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Harvard Drug is being sued as a Distributor Defendant.

2.27 Defendant **Top Rx, LLC (“Top Rx”)** is a Delaware Corporation with its principal office in Bartlett, Tennessee. Top Rx distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs’ original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Top Rx is being sued as a Distributor Defendant.

2.28 Defendant **Walgreens Boots Alliance, Inc. (“Walgreens”)** is a Delaware corporation with its principal place of business in Deerfield, Illinois. During all relevant times, Walgreens distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs’ original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Walgreens is being sued as a Distributor Defendant.

2.29 Defendant **Wal-Mart Inc. (“Wal-Mart”)** formerly known as Wal-Mart Stores, Inc., is a Delaware corporation with its principal place of business in Bentonville, Arkansas. Wal-Mart is registered to conduct business and/or conducts business in Plaintiffs’ Communities as a licensed wholesale distributor. Wal-Mart distributed opioids, in violation of the duties owed to Plaintiffs as set forth in Plaintiffs’ original complaint and the other allegations incorporated herein, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. Wal-Mart is being sued as a Distributor Defendant.

2.30 Defendant **West-Ward Pharmaceuticals Corp. k/n/a Hikma Pharmaceuticals, PLC (“West-Ward”)** is a Delaware corporation with its headquarters in Eatontown, New Jersey. West-Ward manufactures, promotes, distributes, and/or sells opioids throughout Plaintiffs’ Communities and/or the rest of the nation in violation of the duties owed to Plaintiff, in sufficient quantities to be a proximate cause of Plaintiffs’ injuries. West-Ward Pharmaceuticals Corp. is being sued as a Marketing Defendant.

2.31 Defendant **Zydus Pharmaceuticals (USA) Inc. (“Zydus”)** is a New Jersey corporation with its principal place of business in Pennington, New Jersey. Zydus manufactures,

promotes, distributes, and/or sells opioids throughout Plaintiffs' Communities and/or the rest of the nation in violation of the duties owed to Plaintiffs, in sufficient quantities to be a proximate cause of Plaintiffs' injuries. Zydus is being sued as a Marketing Defendant.

COMMON FACTUAL ALLEGATIONS

3. By checking the boxes in this section, Plaintiff hereby incorporates by reference to this document the common factual allegations set forth in the *Summit County* Pleadings as identified in the Court's Order implementing the Short Form procedure. Doc. #: 1282.

☒ Common Factual Allegations (Paragraphs 130 through 670 and 746 through 813)

☒ RICO Marketing Enterprise Common Factual Allegations (Paragraphs 814-848)

☒ RICO Supply chain Enterprise Common Factual Allegations (Paragraphs 849-877)

4. If additional claims are alleged below that were not pled in Plaintiff's Existing Complaint (other than the RICO claims asserted herein), the facts supporting those allegations must be pleaded here. Plaintiff(s) assert(s) the following additional facts to support the claim(s) identified in Paragraph 6 below (below or attached):

N/A

CLAIMS

5. The following federal **RICO causes of action** asserted in the *Summit County* Pleadings as identified in the Court's implementing order and any subsequent amendments, Doc. #: 1282, are incorporated in this Short Form by reference, in addition to the causes of action already asserted in the Plaintiff(s)'s Existing Complaint (check all that apply):

☒ First Claim for Relief – Violation of RICO, 18 U.S.C. § 1961 *et seq.* – Opioid Marketing Enterprise (Against Defendants Purdue, Cephalon, Janssen, Endo and Mallinckrodt (the "RICO Marketing Defendants")) (*Summit County* Pleadings, Paragraphs 878-905)

☒ Second Claim for Relief – Violation of RICO, 18 U.S.C. § 1961 *et seq.* – Opioid Supply Chain enterprise (Against Defendants Purdue, Cephalon, Endo, Mallinckrodt, Actavis, McKesson, Cardinal, and AmerisourceBergen (the “RICO Supply Chain Defendants”)) (*Summit County* Pleadings, Paragraphs 906-938)

6. Plaintiff asserts the following **additional claims** as indicated (below or attached):

N/A

7. To the extent Plaintiff(s) wish(es) to **dismiss claims** previously asserted in Plaintiff(s)’s Complaint, they are identified below and will be dismissed without prejudice.

N/A

WHEREFORE, Plaintiff(s) prays for relief as set forth in the *Summit County* Pleadings in *In Re National Prescription Opiate Litigation* in the United States District Court for the Northern District of Ohio, MDL No. 2804 and in Plaintiff’s Existing Complaint as has been amended herein.

Dated: March 16, 2021

/s/ Robert K. Finnell

ROBERT K. FINNELL

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of March, 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF systems.

By: /s/ Robert K. Finnell
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